

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :

v. :

MAX VANCE :

a/k/a ANDRE J. BURK, :

Defendant. :

No. 4:24-CR- 15

(Judge Brann )

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

18 U.S.C. § 1030(a)(2)

(Obtaining Information from Protected Computer)

On or about November 29, 2023, within the Middle District of  
Pennsylvania and elsewhere, the defendant,

MAX VANCE  
a/k/a ANDRE J. BURK,

intentionally accessed a computer without authorization and exceeded  
authorized access to a computer, and thereby obtained information from  
a protected computer, and the value of the information obtained  
exceeded \$5,000.

In violation of Title 18, United States Code, Sections 1030(a)(2)(C)  
and (c)(2)(B)(iii).

FILED  
SCRANTON  
JAN 30, 2024  
PER dw  
DEPUTY CLERK

## **FORFEITURE ALLEGATION**

The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(2)(B) and Title 18, United States Code, Section 1030(i).

Upon conviction of an offense in violation of Title 18, United States Code, Section 1030(a)(2), the defendant,

**MAX VANCE**  
**a/k/a ANDRE J. BURK,**

shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property real or personal, involved in such offense, or any property traceable to such property. The property to be forfeited includes, but is not limited to:

- a. A personal external drive (USB drive), Samsung model PSSD T7 with a Serial Number of A112409T0SN9X6S.
- b. A sum of money equal to the proceeds derived from or obtained as a result of such offense.

If any of the property described above, as a result of any act or

omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All pursuant to Title 18, United States Code, Section 982(a)(2)(B) and Title 18, United States Code, Section 1030(i).

A TRUE BILL

GERARD M. KARAM  
United States Attorney

  
KYLE A. MORENO  
Assistant United States Attorney

  
FOREPERSON

1/30/2024  
Date